

**UNITED STATES DISTRICT COURT
DISTRICT OF MAINE**

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UNITED STATES OF AMERICA,

Plaintiff,

-against-

414 EAST KENNEBEC ROAD,
MACHIAS, MAINE, with all
appurtenances and improvements thereon,

Defendant In Rem.
-----X

U.S. DISTRICT COURT
DISTRICT OF MAINE
RECEIVED & FILED

2024 OCT 15 P 2:41

Docket No.: 24-cv-168

ANSWER BY DEFENDANT
FANNY SUN Pro Se

FANNY SUN, as Owner and Manager of HBA Properties, LLC, answers Plaintiff's Verified Complaint for Forfeiture *In Rem* as follows:

1. I deny knowledge and/or information sufficient to form a belief as to each and every allegation contained in paragraph "1" of the Complaint. I denying having any knowledge relating to the alleged illegal use of the property to grow marijuana. HBA Properties, LLC and I were out of possession landlord(s). The tenant was Bohua Yang.
2. I deny knowledge and/or information sufficient to form a belief as to each and every allegation contained in paragraph "2" of the Complaint.
3. I admit that HBA Properties, LLC is the title owner to the property located at 414 East Kennebec Road in Machias, Maine, as is alleged in paragraph "4" of the Complaint.
4. I admit that I am the Manager of the LLC known as HBA Properties, LLC, as is alleged in paragraph "4" of the Complaint.
5. I deny having any knowledge or information concerning what, if anything, the tenant grew and stored on the property, as alleged in paragraph "5" of the Complaint.
6. I deny knowledge and/or information sufficient to form a belief as to each and every allegation contained in paragraph "6" of the Complaint, except admit that the photograph depicts a house and buildings which look similar to those owned by HBA Properties.
7. I admit the allegations contained in paragraph "7" of the Complaint.
8. I admit the allegations contained in paragraph "8" of the Complaint.

9. I deny knowledge and/or information sufficient to form a belief as to each and every allegation contained in paragraph “9” of the Complaint. I have no knowledge of the alleged use of the property by the tenant Bohua Yang.
10. I deny knowledge and/or information sufficient to form a belief as to each and every allegation contained in paragraph “10” of the Complaint. I have no knowledge of the alleged use of the property by the tenant.
11. I deny knowledge and/or information sufficient to form a belief as to each and every allegation contained in paragraph “11” of the Complaint.
12. I deny knowledge and/or information sufficient to form a belief as to each and every allegation contained in paragraph “12” of the Complaint.
13. I deny knowledge and/or information sufficient to form a belief as to each and every allegation contained in paragraph “13” of the Complaint.
14. I deny knowledge and/or information sufficient to form a belief as to each and every allegation contained in paragraph “14” of the Complaint.
15. I deny knowledge and/or information sufficient to form a belief as to each and every allegation contained in paragraph “15” of the Complaint.
16. I deny the allegations contained in paragraph “16” of the Complaint, except admit that I may have left a bottle of prescription medication at the property when I was there to pick up rental payments, I did purchase fertilizer for my tenant Bohua Yang – as he directed, and I did drive to Maine from New York in order to obtain the rental payments.
17. I deny the allegations contained in paragraph “17” of the Complaint.
18. I deny knowledge and/or information sufficient to form a belief as to each and every allegation contained in paragraph “18” of the Complaint.
19. I deny knowledge and/or information sufficient to form a belief as to each and every allegation contained in paragraph “19” of the Complaint.
20. I deny knowledge and/or information sufficient to form a belief as to each and every allegation contained in paragraph “20” of the Complaint.

WHEREFORE I request that this Court dismiss Plaintiff's Complaint, together with such other
and former relief, is just and proper.

Dated: Brooklyn, New York
October 14, 2024


FANNY SUN

FANNY SUN
31 Leonard Street, Apt. 9H
Brooklyn, New York 11206

Hon. District Judge John A. Woodcock, JR.
U.S. District Court, District of Maine
Margaret Chase Smith Federal Building & Courthouse
202 Harlow Street
Bangor, Maine 04401

Darcie N. McElwee, United States Attorney
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Clerk of Court
U.S. District Court, District of Maine
Margaret Chase Smith Federal Building & Courthouse
202 Harlow Street
Bangor, Maine 04401

Matter of U.S. v. 414 East Kennebec Road
Machias, Maine
24 cv 168-JAW

Dear Hon. District Judge and Clerk of Court:

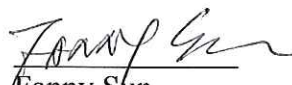
I am the owner of HBA Properties, LLC, the title owner to property known as 414 East Kennebec Road, Machias, Maine.

I am writing this as a pro se claimant regarding the above referenced matter and property.

I respectfully request a thirty (30) days adjournment of the case so that I can retain a local Maine attorney who is licensed in Federal Court to assist me in this matter. I have tried to find an attorney, but it has been very difficult.

Enclosed a copy an Answer to the Verified Complaint for Forfeiture In Rem. I will submit a response to the interrogatories separately.

Thank you,


Fanny Sun

Encl: answer